

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

November 19, 2013

Randy Moore  
Regional Forester  
Pacific Southwest Region  
Regional Office, R5  
1323 Club Drive  
Vallejo, CA 94592

Subject: Supplemental Final Environmental Impact Statement for the Sierra Nevada Forest Plan Amendment Project--NEPA Alert #14 project, (CEQ# 20130267).

Dear Mr. Moore:

The Environmental Protection Agency (EPA) has reviewed the Supplemental Final Environmental Impact Statement (SFEIS) for the Sierra Nevada Forest Plan Amendment Project--NEPA Alert #14 Project (Project). Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA reviewed the Supplemental Draft Environmental Impact Statement and provided comments to the Sierra Nevada Forest on May 5th, 2010. We rated the SDEIS Environmental Objections - Insufficient Information (EO-2), based on our review of the information in the 2001 Draft Environmental Impact Statement (EIS), 2001 Final EIS, and 2004 Supplemental EIS, which identified avoidable significant environmental impacts to water quality, sensitive habitats, and threatened and endangered species. Our objections also reflected the decision to defer the evaluation of transportation impacts on water quality. We recommended that the Final Supplemental EIS describe the benefits and impacts of each management strategy identified in the document and summarize scientific data on the relative effectiveness of each approach in meeting specific management objectives and desired conditions. We also sought assurances that point discharges and landslide sediment inputs from road failures and unmaintained roads would be minimized to the greatest extent feasible, and recommended that program-level guidance regarding decommissioning targets, mitigation strategies that avoid or reduce impacts associated with roads, and forest-wide transportation priorities be addressed at the programmatic level.

In response to our comments, Appendix A of the Final Supplemental EIS refers back to the 2001 FEIS and the 2004 SEIS, which were the sources of our original objections. No additional information is provided to clarify the benefits and impacts of each management strategy. Regarding the impacts of roads, we acknowledge the Forest Service's response that, by implementing Subpart B of the 2005 Travel Management Rule, the Service has been able to reduce impacts from unmanaged cross country travel, and we recognize that further work on the travel analysis process is underway pursuant to Subpart A of the 2005 Travel Management Rule. We appreciate the information provided regarding the Watershed Condition Framework, which we understand will provide a basis for developing watershed restoration action plans and site-specific restoration projects that may address some transportation related impacts.

While our objections to the proposed action have not been fully addressed, EPA recognizes that the forests covered by the subject Forest Plan Amendment are beginning to work on new amendments to comply with the 2012 Forest Rule. We look forward to working with you during this process.

We appreciate the opportunity to review this SFEIS. Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project, James can be reached at (415) 972-3852 or [munson.james@epa.gov](mailto:munson.james@epa.gov).

Sincerely,

/s/

Kathleen Martyn Goforth, Manager  
Environmental Review Office